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9 Attorneys for Plaintiff AARON RICH.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 *In the Matter of a Subpoena to Non-Party*
14 *Twitter, Inc.*

15 AARON RICH

16 Plaintiff,

17 v.

18 EDWARD BUTOWSKY, MATTHEW
19 COUCH, AMERICA FIRST MEDIA, and
THE WASHINGTON TIMES,

20 Defendants.

Case No. 4:20-mc-80081-DMR

(D.C. Case No. 1:18-cv-00681-RJL)

**DECLARATION OF SAMUEL HALL IN
SUPPORT OF MOTION TO SEAL**

Date: June 4, 2020

Time: 9:00 a.m.

Dept:

Judge: Magistrate Judge Donna M. Ryu

1 I, Samuel Hall, declare and certify:

2 (1) I am counsel for Plaintiff Aaron Rich (“Plaintiff”) in the underlying action *Rich v.*
3 *Butowsky et al*, Civil Action No. 1:18-cv-00681-RJL (D.D.C.) (the “D.C. Litigation”). This
4 declaration is based on my personal knowledge and upon information provided to me in my official
5 capacity.

6 (2) Exhibits 1 and 2 of Plaintiff’s Opposition to Twitter Inc.’s Motion to Quash or
7 Modify Subpoena (“Opposition”), are true and correct copies of documents produced in *Rich v.*
8 *Butowsky et al*, Civil Action No. 1:18-cv-00681-RJL (D.D.C.) by Defendant Edward Butowsky,
9 bearing Bates stamps BUTOWSKY0000608 and BUTOWSKY0000002, respectively. These
10 documents were designated as “Highly Confidential Information – Attorneys’ Eyes Only” by
11 Defendant Butowsky under the protective order entered into in the D.C. Litigation. *See* D.C.
12 Litigation (Dkt. 29).

13 (3) The redacted portions of the Opposition quote, or derive information from, Exhibits
14 1 and 2 of the Opposition and are therefore also designated as “Highly Confidential Information –
15 Attorneys’ Eyes Only” by Defendant Butowsky under the protective order entered into in the D.C.
16 Litigation. *See* D.C. Litigation (Dkt. 29).

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed this 14th day of May, 2020, in Washington D.C.

19
20 By: /s/Samuel Hall

21 SAMUEL HALL

22 I attest that concurrence in the filing of this document has been obtained from the signatory who
23 is listed on the signature page.

24 By: /s/Benedict Y. Hur

25 BENEDICT Y. HUR
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